

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America
v.
Victor MARQUEZ-VILLANUEVA

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 5, 2016 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 21 Section 841(a)(1)

Offense Description

Knowingly and unlawfully posses with the intent to distribute a controlled substance listed under Schedule I, of the Controlled Substances Act, to wit; approximately 151.2 kilograms of marijuana.

This criminal complaint is based on these facts:

See Attachment 1☒ Continued on the attached sheet.

Complainant's signature

Christopher Delaney, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/09/2016*Judge's signature*City and state: Laredo, Texas

U.S. Magistrate Judge Guillermo R. Garcia

Printed name and title

Attachment 1

On May 5, 2016, a United States Border Patrol Agent (USBP) was observing traffic at the intersection of Texas Highway (TX) 83 and 44. At approximately 6:45 a.m. the agent observed a red Dodge Ram pickup truck traveling south on TX 83 and then turn east onto TX 44. As the vehicle passed the agent's position he observed two individuals in the cab of the truck. The agent noticed the driver was a young male wearing a pink shirt. He also noticed the passenger was an older male wearing a straw hat. At approximately 7:00 a.m., the agent drove east on TX 44. As the agent neared the intersection of TX 44 and Interstate Highway (IH) 35 he noticed the same red Dodge Ram heading east on TX 44. As the agent approached the Dodge Ram it suddenly slowed down and started traveling at a low rate of speed. The agent noticed the back seat of the truck now had four individuals. The four individuals were not in the vehicle when the agent initially saw the vehicle. The agent radioed another agent, who was observing traffic near Encinal TX, and informed him of what he had observed. Both agents observed the Dodge Ram turn north onto IH 35. The agents followed the vehicle. During this time one of the agents performed a registration check on the Dodge Ram bearing Texas license plate GTT-0941. As the registration check was being returned the Dodge Ram suddenly slowed down and pulled to the shoulder of IH 35 near the 41 mile marker. The vehicle came to a sudden stop. The driver, who was wearing a pink shirt, along with two individuals from the rear seat, exited the vehicle and ran west across the south bound lane of IH 35. The front passenger, who was wearing the straw hat, along with three individuals from the rear seat, exited the Dodge Ram and ran east into the brush. A border patrol agent followed and apprehended the driver of the Dodge Ram who was later positively identified as Victor MARQUEZ-VILLANUEVA. The border patrol agent maintained visual of MARQUEZ-VILLANUEVA during the entire foot pursuit. A search of the vehicle revealed six large green bags of marijuana totaling approximately 151.2 kilograms. On May 5, 2016, DEA agents responded to the Laredo North Border Patrol Station. At approximately 12:27 p.m., DEA Agents interviewed MARQUEZ-VILLANUEVA and read him his Miranda Rights in the Spanish language directly from a DEA Form 13B. MARQUEZ-VILLANUEVA stated that he understood his rights but refused to answer questions. He requested a lawyer. MARQUEZ-VILLANUEVA was subsequently arrested and transported to the Webb County Jail.